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A Limited Liability Partnership
Including Professional Corporations
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Attorneys for Defendant.
CHEVRON U.S.A. INC.,
a Pennsylvania corporation

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF ROBERT E.
MUSSIG IN SUPPORT OF
DEFENDANT CHEVRON U.S.A. INC.'S
MOTION IN LIMINE NO. 2 TO
EXCLUDE ANY EXPERT
TESTIMONY FROM DR.
ALEXANDER MARMUREANEU**

Date: July 29, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – Fifth Floor

District Judge: Hon. Hernán De. Vera

Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023

Trial Date: August 19, 2025

DECLARATION OF ROBERT MUSSIG

I, Robert Mussig, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron USA, Inc. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I took the deposition of Plaintiff Mark Snookal on May 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from Plaintiff's deposition transcript.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Medical Suitability for Expatriate Assignment History & Physical Examination, which was authenticated at Plaintiff's deposition as Exhibit 3.

4. Attached hereto as **Exhibit C** is a true and correct copy of the August 29, 2019 email from Dr. Scott Levy regarding Plaintiff Mark Snookal, which was authenticated at Plaintiff's deposition as Exhibit 6.

5. Dr. Victor Adeyeye was deposed in this matter on November 15, 2024 and April 22, 2025, and I am in possession of certified copies of the deposition transcripts. Attached hereto as **Exhibit D** is a true and correct copy of relevant excerpts from volume one of Dr. Adeyeye's deposition transcript.

6. Dr. Ujomoti Akintunde was deposed in this matter on October 31, 2024, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit E** is a true and correct copy of relevant excerpts from Dr. Akintunde's deposition transcript.

7. Dr. Eshiofe Asekomeh was deposed in this matter on October 10, 2024, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit F** is a true and correct copy of relevant excerpts from Dr. Asekomeh's deposition transcript.

8. My office took the deposition of Plaintiff's Rebuttal Expert, Dr. Alexander R. Marmureanu on January 29, 2025, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit G** is a true and correct copy of relevant excerpts from Dr. Marmureanu's deposition transcript.

9. Attached hereto as **Exhibit H** is a true and correct copy of Dr. Marmureanu's Expert Report which was authenticated at his deposition as Exhibit 2.

10. Dr. Scott Levy was deposed in this matter on August 30, 2024, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit I** is a true and correct copy of relevant excerpts from Dr. Levy's deposition transcript.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at Los Angeles, California.

/s/ Robert Mussig
ROBERT MUSSIG